

**From:** [charger22@aol.com](mailto:charger22@aol.com)  
**To:** [Harrington, Dwayne](mailto:Harrington.Dwayne@epa.gov); [djohnson@gesoncall.com](mailto:djohnson@gesoncall.com); [Banner, Ellen](mailto:Banner.Ellen@epa.gov); [rtonetta@vinelandcity.org](mailto:rtonetta@vinelandcity.org); [rpagnini@vinelandcity.org](mailto:rpagnini@vinelandcity.org)  
**Subject:** Re: more questions  
**Date:** Tuesday, July 19, 2016 5:47:05 PM  
**Attachments:** [piho report comments.DOC](#)

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Hi everyone

I have attached my response for the PIHO reports

Larry

-----Original Message-----

From: Harrington, Dwayne <[Harrington.Dwayne@epa.gov](mailto:Harrington.Dwayne@epa.gov)>  
To: djohnson <[djohnson@gesoncall.com](mailto:djohnson@gesoncall.com)>; charger22 <[charger22@aol.com](mailto:charger22@aol.com)>  
Sent: Mon, Jul 18, 2016 12:49 pm  
Subject: Fwd: more questions

Here are both Piho reports to review

Thanks

Sent from my iPad

Begin forwarded message:

**From:** "Lucarino, Kelli" <[Lucarino.Kelli@epa.gov](mailto:Lucarino.Kelli@epa.gov)>  
**To:** "Norrell, Neil" <[Norrell.Neil@epa.gov](mailto:Norrell.Neil@epa.gov)>, "Regna, Jean" <[Regna.Jean@epa.gov](mailto:Regna.Jean@epa.gov)>, "Harrington, Dwayne" <[Harrington.Dwayne@epa.gov](mailto:Harrington.Dwayne@epa.gov)>  
**Cc:** "Doyle, James" <[Doyle.James@epa.gov](mailto:Doyle.James@epa.gov)>, "Mosher, Eric" <[Mosher.Eric@epa.gov](mailto:Mosher.Eric@epa.gov)>, "Banner, Ellen" <[Banner.Ellen@epa.gov](mailto:Banner.Ellen@epa.gov)>  
**Subject:** RE: more questions

Just to be clear, there are 2 reports from Piho (the PRP's contractor). One is the assessment report dated 6/30/16 which appears to be based on an inspection conducted in January by Piho. The second document is just Piho providing comments to why he thinks the system is safe and the ammonia should not be removed from the system. Both documents are attached to this email.

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[lucarino.kelli@epa.gov](mailto:lucarino.kelli@epa.gov)

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**From:** Norrell, Neil  
**Sent:** Monday, July 18, 2016 12:32 PM

**To:** Regna, Jean <[Regna.Jean@epa.gov](mailto:Regna.Jean@epa.gov)>; Lucarino, Kelli <[Lucarino.Kelli@epa.gov](mailto:Lucarino.Kelli@epa.gov)>; Harrington, Dwayne <[Harrington.Dwayne@epa.gov](mailto:Harrington.Dwayne@epa.gov)>  
**Cc:** Doyle, James <[Doyle.James@epa.gov](mailto:Doyle.James@epa.gov)>; Mosher, Eric <[Mosher.Eric@epa.gov](mailto:Mosher.Eric@epa.gov)>; Banner, Ellen <[Banner.Ellen@epa.gov](mailto:Banner.Ellen@epa.gov)>  
**Subject:** RE: more questions

Jean,

As the report is not the work plan that the facility has promised, I don't see the point in review and comment by our contractors only to have them review and comment again on the work plan.

Also, in my opinion, neither EPA or it's contractors should explain the report. Any explanation should come from the facility engineers (Piho).

Neil

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**From:** Regna, Jean  
**Sent:** Monday, July 18, 2016 12:22 PM  
**To:** Lucarino, Kelli <[Lucarino.Kelli@epa.gov](mailto:Lucarino.Kelli@epa.gov)>; Harrington, Dwayne <[Harrington.Dwayne@epa.gov](mailto:Harrington.Dwayne@epa.gov)>; Norrell, Neil <[Norrell.Neil@epa.gov](mailto:Norrell.Neil@epa.gov)>  
**Cc:** Doyle, James <[Doyle.James@epa.gov](mailto:Doyle.James@epa.gov)>; Mosher, Eric <[Mosher.Eric@epa.gov](mailto:Mosher.Eric@epa.gov)>; Banner, Ellen <[Banner.Ellen@epa.gov](mailto:Banner.Ellen@epa.gov)>  
**Subject:** RE: more questions

Thank you – can someone review the Piho report – we should include, for the order's administrative record, our explanation /response

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**From:** Lucarino, Kelli  
**Sent:** Monday, July 18, 2016 11:21 AM  
**To:** Regna, Jean <[Regna.Jean@epa.gov](mailto:Regna.Jean@epa.gov)>; Harrington, Dwayne <[Harrington.Dwayne@epa.gov](mailto:Harrington.Dwayne@epa.gov)>; Norrell, Neil <[Norrell.Neil@epa.gov](mailto:Norrell.Neil@epa.gov)>  
**Cc:** Doyle, James <[Doyle.James@epa.gov](mailto:Doyle.James@epa.gov)>; Mosher, Eric <[Mosher.Eric@epa.gov](mailto:Mosher.Eric@epa.gov)>; Banner, Ellen <[Banner.Ellen@epa.gov](mailto:Banner.Ellen@epa.gov)>  
**Subject:** RE: more questions

Here are all of the reports we have from our contractors. The IRS system assessment report which was sent to you on Friday, the structural assessment report from Tetra Tech which sent to you on Friday, and the inspection report from Arctic from their inspection on Saturday which was sent to you on Saturday.

Since time is of the essence, can we speak any earlier than 2pm??

Since the Piho report is not the PRP's official work plan, we have not had our contractors review it or respond to it.

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**From:** Regna, Jean  
**Sent:** Monday, July 18, 2016 11:11 AM  
**To:** Lucarino, Kelli <[Lucarino.Kelli@epa.gov](mailto:Lucarino.Kelli@epa.gov)>; Harrington, Dwayne  
<[Harrington.Dwayne@epa.gov](mailto:Harrington.Dwayne@epa.gov)>; Norrell, Neil <[Norrell.Neil@epa.gov](mailto:Norrell.Neil@epa.gov)>  
**Cc:** Doyle, James <[Doyle.James@epa.gov](mailto:Doyle.James@epa.gov)>  
**Subject:** more questions

Can we talk at 2 today? We have some follow up questions – here's a few -

We reviewed the (handwritten) document from Arctic regarding the 7/16 inspection –  
Did we receive a report from IRS regarding the 7/11 inspection/assessment?

Has anyone reviewed and prepared a response/analysis re the 7/14 letter from Piho?

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*Aleksandrich Compliance & Engineering Services LLC*

**Chief Robert Pagnini**  
**Vineland Fire Department**  
**Vineland, NJ**

**July 19, 2016**

**Prepared By:**  
**Larry Aleksandrich**

**SUBJECT:**  
**South Jersey Ice and Cold Storage**  
**Critical Actions List**  
**544 East Pear Street**  
**Vineland, NJ 08360**

**PURPOSE:**

The purpose of this report is to provide feedback concerning the Piho reports for the South Jersey Ice and Cold Storage facility located in Vineland, New Jersey.

There are many critical areas of concern that must be addressed immediately.

I (Larry Aleksandrich) strongly disagree with Jack Piho concerning the condition of the refrigeration system.

The system has NOT been properly maintained as Jack Piho suggests (ie age of relief valves, no relief valve on vessel, ammonia detectors NOT functioning, excessive ice, etc).

The system must be pumped so that the repairs can be made to the system

I have listed the critical items below that must be addressed before the system can be recharged:

- a. Defrost the liquid gravity evaporator coils in all storage areas due to excessive ice buildup which could cause a major piping failure and/or imminent collapse of the bunker coils resulting in a major ammonia leak.

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- b. Investigate the source of All ammonia leaks in the Ammonia Machinery Room
- c. Investigate and repair the water infiltration into the Block Ice tank
- d. Investigate the condition of the Block Ice tank coil
- e. Excessive ice on all evaporators in ALL product storage areas.
- f. Walls in storage areas show water penetration and ice buildup which could lead to building collapse and an ammonia release.
- g. The suction line on the 1<sup>st</sup> floor are supported by a beam which has significant damage identified by the structural engineer
- h. Evaluate the fitness of the condensers including EDDY current testing if possible
- i. Replace the relief valves on the Condensers (> than 5 years old)
- j. Install the missing relief valve on vessel
- k. Provide U1A documents for ALL vessels
- l. Replace the relief valve and protect the glass tube sight glass on the High Pressure Receiver.
- m. Install dual relief valves on the High Pressure Receiver
- n. Replace the relief valves on all vessels (> than 5 years old)
- o. Replace the relief valves on the compressors.
- p. Verify the operation of the ammonia detectors and calibrate the ammonia detectors in the Ammonia Machinery Room.
- q. Complete a mechanical integrity study by a qualified contractor using IIAR Bulletin 109 as a guideline to determine system fitness on all system equipment (bunker coils, room evaporators, etc).
- r. Verify safety interlocks to shut down refrigeration equipment (Compressors and liquid pumps in Ammonia Machinery Room during emergency shutdowns).
- s. Install manual ventilation switches outside the Ammonia Machinery Room
- t. Install emergency stop switches outside the Ammonia Machinery Room
- u. install audio/visual ammonia detection alarms outside of each room containing ammonia piping and equipment.
- v. Install eyewash/shower station outside the Ammonia Machinery Room
- w. Verify the adequacy of the ventilation system
- x. Paint, reinsulate, and label all process piping, vessels, equipment, and valves according to industry standards and code.
- y. Conduct a hazard review on the ammonia refrigeration system.
- z. Install proper signage including NFPA diamonds on the Engine Room entrances
- aa. Pressure test the system with nitrogen and produce reports
- bb. Pull vacuum on the system to prove tightness before charging ammonia.
- cc. Remove pipe insulation and inspect piping using NDT to determine thickness
- dd. Perform vibration and oil analysis on the two screw compressors

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- ee. Install wind socks on the building
- ff. Provide two means of egress to the storage floors (NOT the freight Elevator)
- gg. Correct the floor that is heaved on the first floor
- hh. Identify the reputable contractor and provide contractor service reports for the past 10 years
- ii. Provide relief calculations for the system
- jj. Provide ventilation calculations for the Engine Room
- kk. Provide a relief discharge point 15 feet above the roof line with an ammonia detector installed
- ll. Provide operator training records for the operators

Please let me know if there are any questions concerning this report.

Thanks,

Larry Aleksandrich